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Exhibit 12

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IN THE UNITED STATES DISTRICT COURT
1
        FOR THE DISTRICT OF NEW JERSEY
2
                CAMDEN VICINAGE
3
    IN RE: VALSARTAN, : MDL NO. 2875
    LOSARTAN, AND
4
    IRBESARTAN PRODUCTS
                            : CIVIL NO.
    LIABILITY LITIGATION :
5
                               19-2875
                              (RBK/JS)
6
    THIS DOCUMENT APPLIES :
                               HON. ROBERT
7
    TO ALL CASES
                               B. KUGLER
8
           - CONFIDENTIAL INFORMATION -
           SUBJECT TO PROTECTIVE ORDER
9
                    VOLUME II
10
11
                 April 30, 2021
12
13
14
           Continued videotaped remote
   deposition of BANDARU VENKATA RAMARAO,
   taken pursuant to notice, was held via
15
   Zoom Videoconference, beginning at 6:13
16
   p.m., India Standard Time, on the above
   date, before Michelle L. Gray, a
17
   Registered Professional Reporter,
   Certified Shorthand Reporter, Certified
18
   Realtime Reporter, and Notary Public.
19
20
21
          GOLKOW LITIGATION SERVICES
       877.370.3377 ph | 917.591.5672 fax
22
                 deps@golkow.com
23
24
```

```
1
           getting into the U.S. country, and
2
           we are in line with the approved
3
           specifications. We manufactured
4
           and tested again.
5
                 As I mentioned, prior to
6
           2018 we never know that this will
7
          be present in the valsartan
8
          product. That is the reason we
9
          were unable to get at this one.
10
   BY MR. SLATER:
11
          Q. Okay. Let me ask the
12
   question a little differently to try
13
   to -- maybe I'll focus better.
14
                 Because of these health
15
   effects that we are talking about and the
16
   risk of cancer, it would never be
17
   acceptable to knowingly sell valsartan
18
   containing NDMA, correct?
19
           Α.
                 Yeah.
20
                 MR. SLATER: And let's go
21
          now to the top of Page 23, the top
22
           of the right-hand column. Just to
23
           finish this up.
24
   BY MR. SLATER:
```

```
1
                 Looking at the top of
           0.
2
   Page 23 in the right-hand column, it
3
   states, "Therefore, owing to the
4
   considerable evidence of carcinogenicity
   of NDMA in laboratory species, evidence
5
6
   of direct interaction with DNA consistent
7
   with tumor formation, and the apparent
8
   lack of qualitative species-specific
9
   differences in the metabolism of this
10
   substance, NDMA is highly likely to be
11
   carcinogenic to humans."
12
                 And, again, that's the
13
   reason why the valsartan that was sold by
   Unit 5 with the levels of NDMA that were
14
15
   seen, that never would have knowingly
16
   been done if you had known the NDMA was
17
   there because of that health risk,
18
   correct?
19
                 Yes.
           Α.
20
                 MR. SLATER: Okay. We can
21
           take that down.
22
                 Let's go to Exhibit 29.
23
                 (Document marked for
24
           identification as Exhibit
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1
                 And that was a violation of
           Ο.
2
   cGMP and the regulatory requirements
   applicable, correct?
4
           Α.
                 Yeah.
5
                 And again, we talked about
           Ο.
6
         I'm not going to go back to the
7
   scientific literature, but the result of
8
   that was that NDMA ended up in the
9
   valsartan, which is something that causes
10
   cancer, correct?
11
           Α.
                 Yes.
12
                 And the -- rephrase.
           Ο.
13
                 In going back to the FMEA
14
   where you assessed that risk and that
15
   hazard, it was assessed at the highest
16
   level because people ingesting NDMA at
17
   the levels that were found in these pills
18
   is something that will increase their
19
   risk for cancer, correct?
20
           Α.
                 Yes.
21
                 MR. ABRAHAM: Objection.
                                             Ι
22
           think that's outside the scope of
23
           his topic here.
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BY MR. SLATER:

24